

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SHEET METAL WORKERS' INTERNATIONAL  
ASSOCIATION, LOCAL NO. 73,

and

THE TRUSTEES of the SHEET METAL WORKERS  
LOCAL NO. 73 PENSION FUND; SHEET METAL  
WORKERS LOCAL NO. 73 WELFARE FUND; and  
SHEET METAL WORKERS LOCAL NO. 73  
ANNUITY FUND,

Plaintiffs,

V.

RAB AIR BALANCE, INC.,

Defendant.

Case No.: 21 cv 01329

Judge: Joan B. Gottschall

Magistrate: Sunil R. Harjani

**Agreed Motion for Entry of Agreed Judgment Order**

Plaintiffs, by its attorneys, Gregorio & Marco, move this Honorable Court to enter an Agreed Judgment Order against the Defendant, RAB AIR BALANCE, INC., and in support states as follows:

1. Plaintiffs filed their Complaint on March 10, 2021 alleging that the RAB Air Balance, Inc. failed to remit fringe benefits contributions to the Plaintiff Trust Funds.

2. The parties now have reached an agreement to resolve all matters in dispute. Pursuant to agreement, an agreed Judgment will be entered against the defendant, RAB Air Balance, Inc.

3. RAB Air Balance, Inc. and the Plaintiffs have agreed to have a Judgment entered against RAB Air Balance, Inc. in the total amount of \$86,222.51 representing \$70,567.40 in

unpaid fringe benefit contributions, \$10,585.11 in liquidated damages, and \$5,142.00 in attorney fees which are collectable under the terms of the Collective Bargaining Agreement, Trust Agreements and Federal law (29 U.S.C. Section 1132(g)(2)(b)).

4. A copy of the proposed Agreed Judgment Order is attached as **Exhibit 1** and is executed by and Mr. Rogeh Alnajjar, President of RAB Air Balance, Inc., and by Plaintiffs' counsel.

WHEREFORE, Plaintiffs and Defendant, RAB Air Balance, Inc. request that this Court enter an Agreed Judgment Order in the amount of \$86,222.51 against the Defendant, RAB Air Balance, Inc.

By: /s/:Michael J. McGuire  
Michael J. McGuire  
One of the Attorneys for Plaintiffs

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